

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON

In re

ELIZABETH M MURPHY

) Case No. 318-31521-TMB13  
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Debtor(s).      ) **TRUSTEE'S OBJECTION TO**  
                    ) **CONFIRMATION AND MOTION**  
                    ) **TO DISMISS**

Wayne Godare, the Standing Chapter 13 Trustee Objects to Confirmation of the above case for the reason(s) set out below:

- a. Plan is not feasible;
- b. Case/Plan is not proposed in good faith or is forbidden by law;
- c. Plan does not commit all of debtor's excess projected disposable income pursuant to 11 U.S.C. §1325(b)(1)(B) for the applicable commitment period;
- d. Plan does not meet the best interest test of 11 U.S.C. §1325(a)(4);

e. Filing/documentation is deficient: **as requested at the §341(a) hearing, please provide the Trustee with the following:**

1. True signed copy of Debtor's 2017 Federal and State Tax returns;
2. Two full months current paystubs;
3. Declaration from Debtor's parents that indicates they are willing to continue to provide the support as listed on Schedule I for as long as Debtor needs it;
4. Amended Schedules A/B that includes the name of the institution related to the checking account;
5. Amended Schedule D that includes the description of the property, the collateral value, the amount of the claim and the nature of the lien for every creditor on the schedule; also make clear which creditors own the debt and which are only servicing it;
6. Amended Statement of Financial Affairs to include the additional income in #5 for years 2017 and 2018 to date;
7. Add the Chase state court action to the Statement of Financial Affairs;
8. File a declaration in support of the tax refund retention language in the plan.

f. Other:

If within 7 days prior to the scheduled confirmation hearing, debtor fails to take all necessary steps to satisfy each objection marked above, the Trustee may, in his discretion, urge the court for an order dismissing the case without further notice.

I certify that on June 18, 2018, copies of the above Objection and Motion were served on the debtor(s) by first class mail and any debtor(s) attorney by ECF.

DATED: June 18, 2018

/s/ Wayne Godare, Trustee

SCOT J ELIOT  
(mn)